

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEW MEXICO**

IN RE: SANTA FE NATURAL TOBACCO  
COMPANY MARKETING & SALES  
PRACTICES AND PRODUCTS LIABILITY  
LITIGATION

Lead Case No. MD 16-2695 JB/LF

*This Document Relates To All Cases*

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**JOINT MOTION TO EXTEND CERTAIN DEADLINES**

Plaintiffs and Defendants jointly move for an extension of certain case deadlines by approximately three weeks and rescheduling of the hearing on Defendants' motions to dismiss from November 30, 2016 to a time and date to be set by the Court, on or between January 25-31, 2017, and show as follows:

WHEREAS, on June 17, 2016, the Court entered Case Management Order No. 2 (Doc. No. 37) governing the case management and discovery schedule;

WHEREAS, the parties have met, conferred and jointly move to extend the deadlines for: (1) Plaintiff to file the Consolidated Amended Complaint, (2) the parties to respond to initial written discovery requests, (3) the parties to serve amended supplemental Rule 26(a)(1) disclosures, (4) the filing of motions to dismiss and related briefing, and to adjust the date for the hearing on those motions, currently set for November 30, 2016, as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Deadline for Plaintiffs to file consolidated amended complaint.	August 22, 2016	September 19, 2016
Due date for Defendants' responses to initial written discovery requests.	September 6, 2016	October 4, 2016
Parties to serve amended supplemental Fed. R. Civ. P. 26(a)(1) disclosures based on the Consolidated Amended Complaint.	September 21, 2016	October 19, 2016

Deadline for Defendants to file Motions to Dismiss.	September 29, 2016	November 3, 2016
Deadline for Plaintiffs to file Opposition to Motions to Dismiss.	October 31, 2016	December 12, 2016
Deadline for Defendants to file Reply in Support of Motions to Dismiss.	November 21, 2016	January 18, 2017
Hearing on Defendants' motions to dismiss	November 30, 2016 at 9:00 a.m. MST	On a date and time to be set by the Court.

WHEREFORE, the parties jointly move the Court to adopt these proposed amended deadlines. A proposed order is attached hereto as Exhibit A.

Dated: August 18, 2016

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 18, 2016, the foregoing *Joint Stipulation and [Proposed] Order Extending Deadlines* was electronically filed with the Clerk of Court using the CM/ECF system that will send notification of such filing to all counsel of record:

By: *Kathy Love*  
Kathy Love